



Linda S. Adams
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Arnold Schwarzenegger
Governor

August 30, 2006

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON WORK PLAN FOR VADOSE ZONE CHARACTERIZATION AND SITE ASSESSMENT, FORMER UST GROUP 637, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: T0605901125

Dear Mr. Newton:

We have reviewed the above referenced document, dated June 21, 2006, which we received on June 26, 2006. We have the following comments:


- **Section 2, Figures 2-2, Cross-Section A-A' and Figure 2-3, Cross-Section B-B':** Figures 2-2 and 2-3 do not clearly or accurately display the status of the current characterization of soil fuel contamination and release. Please revise these figures.
- **Section 3, Project Tasks, 3.2 Field Work, 10th bullet, Page 3-2:** U.S. EPA Air Method TO-14 was updated to Method 14A in January 1999. In addition, Method TO-14A has been superseded by Method TO-15 for volatile organic compounds in air, for samples collected in canisters. An upgrade to Method TO-15 for quality assurance in petroleum corrective action plans should be considered.
- **3.2.1 Soil Sampling, second paragraph, Page 3-4:** No description of the VLEACH model or its input parameters is provided in the work plan or included the Sampling and Analysis Plan (SAP) or work plan appendices. Please provide sufficient information to allow our review of the appropriateness of the model that you selected.
- **3.2.1 Soil Sampling, third paragraph, bullets one and two, Page 3-4:** Total organic carbon analysis using the Walkley-Black method and moisture content analysis using American Society for Testing and Materials Method D2216 are identified for use at the site. A summary or copy of these methods was not provided in the Sampling and Analysis Plan (SAP) or work plan appendices. Please include these methods in the SAP or work plan appendices.



- **3.2.2 Soil Vapor Testing, first paragraph, Page 3-5:** There is no discussion on the selection of a 25-foot screened interval for the proposed vapor extraction well. A shorter screened interval could be more efficient. Please provide the supporting rationale for the selected vapor extraction well screen length.
- **3.2.2 Soil Vapor Testing, first paragraph, Page 3-5:** A soil vapor extraction (SVE) system is identified as the remedy, but you provided only limited information on the proposed design testing and operation of the SVE system. A complete remedial action system, including process and component diagrams, is not presented in the work plan. A SVE remedial action operation plan is not included in the work plan. Please provide the necessary information.
- **Sampling and Analysis Plan, Table 9-1, Analytical Reporting Limits, Page 9-9:** The aqueous reporting limits for carbon tetrachloride, vinyl chloride, tert-butyl alcohol, tert-amyl methyl ether, and ethyl tert-butyl ether are either at their respective maximum contaminant levels, or above a level of concern. Therefore, the proposed reporting limits are unacceptable.

The proposal to operate a SVE remedial system as discussed within the work plan is not approved. For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

cc via email: Lynn Hornecker, BRAC PMO WEST
Content Arnold, BRAC PMO WEST

